IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

LEON WEINGRAD, individually and on
behalf of all others similarly situated,

               Plaintiff,

   v.

IBAN GLOBAL LLC

and

LIVEFREE EMERGENCY RESPONSE,
INC. D/B/A LIFEBEACON

           Defendants.

Case No. 24-4212

DECLARATION OF LEON WEINGRAD

1.   My name is Leon Weingrad. I am over 18 years old. I can testify competently to the undersigned statements.

2.   This Declaration is being made under the penalty of perjury pursuant to 28 U.S.C. § 1746.

3.   I make this Declaration in opposition to the Defendant's motion to dismiss for lack of personal jurisdiction.

4.   I am the Plaintiff in this lawsuit.

5.   My telephone number 267-XXX-XXXX is a cellular telephone number.

6.   I am the user of 267-XXX-XXXX.

7.   The 267-XXX-XXXX number is registered in my name and I am the subscriber of record.

8.   The 267- area code is associated with the State of Pennsylvania.

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9.   I did not ask for or request calls from LiveFree or IBAN.

10.   As more fully set forth in my Complaint, despite these facts, I received telemarketing calls selling LiveFree's goods and services.

11.   The product marketed to me, a "LifeBeacon" monitor, was produced by LiveFree.

12.   It was shipped to me by LiveFree and had LiveFree's Idaho address as a return address.

13.   On the proposed contract I received along with the equipment, the proposed contract lists "IBAN Global LLC" but LiveFree's Idaho Address.

14.   The proposed contract also directs the product to be returned to LiveFree at LiveFree's address, if necessary.

15.   As explained in the Complaint, when I made the purchase for the LifeBeacon monitor, LiveFree both charged me for and mailed me the device. The product was thus charged by LiveFree.

16.   On July 14, 2025, I called the number listed on paperwork I received with the LiveFree device, 888-498-5849 from the number that received the calls at issue.

17.   I spoke with a representative, who stated that LifeBeacon, LiveFree, and IBAN were all the same company. The representative also confirmed that LiveFree was located in Pocatello, Idaho.

18.   All these actions demonstrate that Defendant LiveFree directed its conduct into Pennsylvania by, among other things, directing IBAN to call my Pennsylvania telephone number, and knowingly accepting the lead and business that IBAN generated as a result of those robocalls, including by stating on a call from a Pennsylvania telephone number that LifeBeacon, LiveFree, and IBAN were all the same company.

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19.   As such, when I called in, the human LiveFree employee with whom I spoke knew from my caller ID that I had a Pennsylvania number and moreover that I was calling from a number that was the subject of this litigation.

20.   Moreover, one of the phone calls I received, and alleged in the complaint, was deliberately spoofed to appear to have come from a Pennsylvania area code. This fact further demonstrates that the Defendants were directing their conduct into Pennsylvania, including to sell LiveFree's products.

21.   This indicates that IBAN, and, as a result, LiveFree, knew that they were targeting Pennsylvania telephone numbers because they used a spoofed Pennsylvania caller ID to place the calls.

22.   LiveFree also billed my credit card with a billing address in Pennsylvania, and as such, knew that it was dealing with Pennsylvania.

23.   The calls I received promoted LiveFree's products and services and were made for the purpose of attempting to get me to purchase the same. No other company's products or services, other than LiveFree's LifeBeacon product, were listed or stated on the call or in any of the materials I received, except insofar as it listed IBAN as the dealer.

24.   Based on the foregoing facts, LiveFree was well aware that I had a Pennsylvania telephone number but continued to market to me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 14th day of July 2025, in the United States of America,

Leon Weingrad
Leon Weingrad (Jul 14, 2025 13:23 PDT)

Leon Weingrad